

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

Date filed: February 27, 2015

Name of company covered by this certification:

This certification is made by the identified officers of Time Warner Cable Inc. on behalf of TWC Digital Phone LLC and Erie Digital Phone, LLC, both interconnected VoIP providers, and the Time Warner Cable Inc. subsidiaries that are telecommunications carriers subject to the Commission's rules regarding customer proprietary network information ("CPNI") (collectively, the "TWC Covered Entities"). Each of the TWC Covered Entities is identified in Exhibit A, attached hereto.

Form 499 Filer ID:

The Form 499 Filer IDs for the Covered Entities are identified in Exhibit A, attached hereto.

Name and Title of Signatories:

Michael Diamond, Acting Chief Marketing Officer [residential services]

John Keib, Executive Vice President, Chief Care Officer [residential services]

Jeffrey Lindsay, Group Vice President and General Manager, Home Phone

Phil Meeks, Executive Vice President and Chief Operating Officer, Business Services

Certification:

I, Michael Diamond, Senior Vice President and Acting Chief Marketing Officer of Time Warner Cable Inc., certify that I am an officer of Time Warner Cable Inc., and acting as an agent of the company, that I have personal knowledge that the TWC Covered Entities have established operating procedures that are adequate to ensure their compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

I, John Keib, Executive Vice President, Chief Care Officer of Time Warner Cable Inc., certify that I am an officer of Time Warner Cable Inc., and acting as an agent of the company, that I have personal knowledge that the TWC Covered Entities have established operating procedures that are adequate to ensure their compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

I, Jeffrey Lindsay, Group Vice President and General Manager, Home Phone, Time Warner Cable Inc., certify that I am an officer of Time Warner Cable Inc., and acting as an agent of the company, that I have personal knowledge that the TWC Covered Entities have established operating procedures that are adequate to ensure their compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

I, Phil Meeks, Executive Vice President and Chief Operating Officer, Business Services, Time Warner Cable Inc., certify that I am an officer of Time Warner Cable Inc., and acting as an agent of the company, that I have personal knowledge that the TWC Covered Entities have established operating procedures that are adequate to ensure their compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

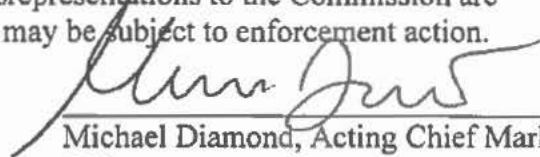
Attached to this certification is a statement explaining how the operating procedures of the TWC Covered Entities ensure that they comply with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

Neither Time Warner Cable Inc. nor any of the TWC Covered Entities has taken any actions against data brokers in 2014.

In 2014, the TWC Covered Entities received sixteen (36) customer complaints involving allegations of unauthorized releases of CPNI. One (1) of these complaints involved the publication of a customer's unlisted telephone number. One (1) of these complaints involved an attempt by an unknown caller seeking to access and make changes to a TWC customer's online account without proper authorization. Six (6) of the complaints involved situations in which an unknown person had reset, or attempted to reset, a customer's online account password. The remaining twenty-eight (28) complaints involved unauthorized access to a customer's online account by one or more unknown third parties. Twenty-six (26) of those complaints involved situations in which a third party apparently gained unauthorized access to a customer's online account and used such access to change the customer's online account password and/or username and activate call forwarding to direct incoming calls to an unauthorized telephone number. TWC apprised law enforcement of these incidents, which appear to have been connected with organized identity theft activity impacting the telecommunications industry more broadly. Although these incidents occurred notwithstanding TWC's use of appropriate and robust authentication procedures, TWC has reviewed its account access policies in light of these incidents and taken steps to minimize recurrence of such unauthorized account access. Of the two (2) remaining complaints, one (1) did not identify any changes to the account by the unknown person and one (1) included an allegation that the customer's credit card number was obtained from the customer's online account information (although the customer's online account information would provide only the last four digits and the expiration date of the customer's credit card). Each of these complaints was resolved promptly by the relevant TWC Covered Entity, and TWC complied with its obligation to report unauthorized releases of CPNI to the Commission and to law enforcement, where applicable.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company

also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.



Michael Diamond, Acting Chief Marketing Officer

Dated: February 26, 2015

John Keib, Executive Vice President, Chief Care Officer

Dated: February __, 2015

Jeffrey Lindsay, Group Vice President and General Manager, Home Phone

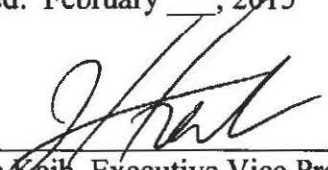
Dated: February __, 2015

Phil Meeks, Executive Vice President and Chief Operating Officer, Business Services

Dated: February __, 2015

also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

Michael Diamond, Senior Vice President
and Acting Chief Marketing Officer
Dated: February __, 2015



John Keib, Executive Vice President, Chief
Care Officer
Dated: February 25, 2015

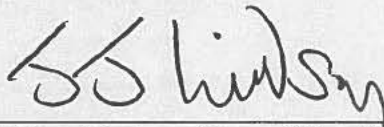
Jeffrey Lindsay, Group Vice President and
General Manager, Home Phone
Dated: February __, 2015

Phil Meeks, Executive Vice President and
Chief Operating Officer, Business Services
Dated: February __, 2015

also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

Michael Diamond, Senior Vice President
and Acting Chief Marketing Officer
Dated: February __, 2015

John Keib, Executive Vice President, Chief
Care Officer
Dated: February __, 2015



Jeffrey Lindsay, Group Vice President and
General Manager, Home Phone
Dated: February 24, 2015

Phil Meeks, Executive Vice President and
Chief Operating Officer, Business Services
Dated: February __, 2015

also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

Michael Diamond, Senior Vice President
and Acting Chief Marketing Officer
Dated: February __, 2015

John Keib, Executive Vice President, Chief
Care Officer
Dated: February __, 2015

Jeffrey Lindsay, Group Vice President and
General Manager, Home Phone
Dated: February __, 2015

A handwritten signature in black ink, appearing to read "P. A. Meeks", written over a horizontal line.

Phil Meeks, Executive Vice President and
Chief Operating Officer, Business Services
Dated: February 27th, 2015

Statement Regarding Compliance with CPNI Regulations

The internal operating procedures and practices of the TWC Covered Entities, as defined in the attached Certification, ensure that the TWC Covered Entities comply with the Commission's rules at 47 C.P.R. § 64.2001, *et. seq.*, governing the use and disclosure of Customer Proprietary Network Information ("CPNI"). The TWC Covered Entities' compliance with the Commission's CPNI rules is demonstrated by the policies, practices, and training procedures detailed below.

In connection with the use of CPNI for marketing purposes in 2014, the TWC Covered Entities did not use CPNI to market either in-category or out-of-category services that the TWC Covered Entities provide to customers. TWC Covered Entities have established a supervisory review and approval process that calls for records of such marketing efforts, should they be made, to be maintained for a minimum of one year.

The TWC Covered Entities' policies provide that the TWC Covered Entities may release or disclose customer CPNI to third parties only with the customer's written consent, except: (i) as required by law in response to a request made pursuant to a valid court order, warrant or appropriate notice from a government agency, or (ii) for the express limited purpose of initiating, rendering, billing and/or collecting for services rendered by the TWC Covered Entities, pursuant to a written and binding agreement that contains restrictions regarding the confidentiality and safeguarding of customer information.

The TWC Covered Entities' policies preclude customer service representatives from discussing or disclosing customers' call detail records on customer-initiated telephone calls, except for limited discussion of call detail records after the customer first—without the customer service representative's assistance—identifies and provides specific information about the particular call to be discussed, including the call date, call time, and telephone number called. The TWC Covered Entities accordingly have not established account passwords for telephone access to call detail records. When a customer requests call detail records during a customer-initiated telephone call, the TWC Covered Entities generally provide that information by directing the customer to the TWC Covered Entities' secure online Web portal and/or by mailing the call detail records to the customer's address of record.

The TWC Covered Entities' policies provide that no person may access CPNI or call detail records via an online web portal until the person requesting such information provides a password that has been established by the customer after that customer has been authenticated through a method that does not include the use of readily-available biographical information. As a matter of policy, the TWC Covered Entities notify customers immediately whenever a customer's password, means of authentication, online account or address associated with the account is created or changed.

The TWC Covered Entities' policies preclude any access to CPNI at retail locations unless the customer has presented a valid, government issued photo identification matching the customer's account information.

The TWC Covered Entities provide CPNI to business customers only as described above or, for business customers who have been assigned a dedicated account representative, pursuant to contractual provisions that specifically address the protection of CPNI.

The TWC Covered Entities also employ several internal operating processes and procedures to ensure compliance with the Commission's CPNI regulations. The TWC Covered Entities require that all relevant personnel are informed of and follow company-approved procedures for authenticating customers before disclosing CPNI. The TWC Covered Entities conduct annual CPNI training for all employees and administer an employee disciplinary program to ensure compliance with internal procedures. This program includes penalties for the violation of internal privacy protection procedures, including the potential termination of employees, when appropriate. The TWC Covered Entities have standardized processes for tracking and resolving customer complaints that relate to unauthorized access to CPNI and for identifying, responding to, documenting and, as appropriate, notifying law enforcement and customers of any breaches of customer CPNI. In addition, the TWC Covered Entities have made publicly available materials that inform customers about CPNI protections and the TWC Covered Entities' authentication and protection practices.

Exhibit A

<u>TWC Covered Entities</u>	<u>499 FID</u>
DukeNet Communications, LLC	820201
Erie Digital Phone, LLC	826359
Time Warner Cable Business LLC	829586
Time Warner Cable Information Services (Alabama), LLC	828505
Time Warner Cable Information Services (Arizona), LLC	828505
Time Warner Cable Information Services (California), LLC	828505
Time Warner Cable Information Services (Colorado), LLC	828505
Time Warner Cable Information Services (Hawaii), LLC	828505
Time Warner Cable Information Services (Idaho), LLC	828505
Time Warner Cable Information Services (Illinois), LLC	828505
Time Warner Cable Information Services (Indiana), LLC	828505
Time Warner Cable Information Services (Kansas), LLC	828505
Time Warner Cable Information Services (Kentucky), LLC	828505
Time Warner Cable Information Services (Maine), LLC	828505
Time Warner Cable Information Services (Massachusetts), LLC	828505
Time Warner Cable Information Services (Michigan), LLC	828505
Time Warner Cable Information Services (Missouri) LLC	828505
Time Warner Cable Information Services (Nebraska), LLC	828505
Time Warner Cable Information Services (New Hampshire), LLC	828505
Time Warner Cable Information Services (New Jersey), LLC	828505
Time Warner Cable Information Services (New Mexico), LLC	828505
Time Warner Cable Information Services (New York), LLC	828505
Time Warner Cable Information Services (North Carolina), LLC	828505
Time Warner Cable Information Services (Ohio), LLC	828505
Time Warner Cable Information Services (Pennsylvania), LLC	828505
Time Warner Cable Information Services (South Carolina), LLC	825090
Time Warner Cable Information Services (Tennessee), LLC	828505
Time Warner Cable Information Services (Texas), LLC	828505
Time Warner Cable Information Services (Virginia), LLC	828505
Time Warner Cable Information Services (Washington), LLC	828505
Time Warner Cable Information Services (West Virginia), LLC	828505
Time Warner Cable Information Services (Wisconsin), LLC	828505
TWC Communications, LLC	826652
TWC Digital Phone LLC	826610
TWCIS HoldCo LLC	828505
Insight Midwest Holdings, LLC	825350
Insight Communications of Central Ohio, LLC	827249
Insight Kentucky Partners II, L.P.	826535
Insight Phone of Indiana, LLC	823164
Insight Phone of Kentucky, LLC	823166
Insight Phone of Ohio, LLC	825351